

UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America

v.

(1) Melvin Charles HILL, Jr.
(2) DeAndre Dayshawn Nelson

Case No. SA:24MJ423

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 03/20/2024 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:*Code Section*

18 U.S.C. §§ 2113 (a) & (d)

18 U.S.C. § 924(c)

Offense Description

Bank Robbery; and Brandishing/use of a Firearm in Furtherance of a Crime of Violence. Penalties: Maximum 25 years imprisonment; Maximum \$250,000 fine, or both Maximum 3 years supervised release; and \$100 mandatory special assessment and Not less than 7 years imprisonment, and not more than life Maximum \$250,000 fine, or both; Maximum 5 years supervised release; and \$100 mandatory special assessment.

This criminal complaint is based on these facts:

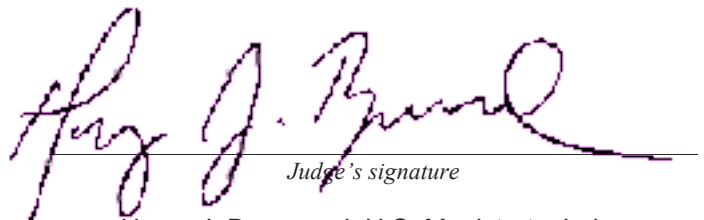
See Attached Affidavit in Support of Application

☒ Continued on the attached sheet.GERALD-RASHID
ROBERTSDigitally signed by GERALD-
RASHID ROBERTS
Date: 2024.03.22 11:27:33
-05'00'*Complainant's signature*

SA Gerald-Rashid S. Roberts, ATF

Printed name and title

Sworn to before me via telephone,

Date: 03/22/2024City and state: Bexar, Texas*Judge's signature*

Henry J. Bemporad, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Gerald-Rashid S. Roberts, being duly sworn, do hereby depose and state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives and have been since January 2022. I am a graduate of the Criminal Investigator Training Program and the ATF Special Agent Basic Training Academy, both conducted at the Federal Law Enforcement Training Center. I received specialized training concerning violations of the Gun Control Act within Title 18 and the National Firearms Act within Title 26, of the United States Code pursuant to firearms violations. I am a duly sworn agent who is authorized to carry firearms, execute warrants, and make arrests for offenses against the United States and to perform such other duties as authorized by law.

2. Prior to becoming a Special Agent with the ATF, I was employed by the Fairfax County (Virginia) Police Department for 11 years where I worked as a detective. I was assigned to the Major Crimes Bureau where I investigated criminal offenses involving sexual assault, child abuse, and other serious crimes against persons.

3. Prior to my tenure with FCPD, I was enlisted in the United States Navy where I served as a member of the US Navy Security Forces for more than 6 years. I completed approximately 430 hours of training at Naval Technical Training Center for Law Enforcement. I conducted numerous antiterrorism/personal protection operations and investigated violations of Uniform Code of Military Justice. My current assignment with the ATF San Antonio I Office, involves the investigation of robberies that affect interstate commerce and violent criminals.

4. The facts contained in this affidavit are based upon information provided to me by other law enforcement officers and witnesses. Since this affidavit is made for the limited purpose of supporting a Criminal Complaint, I have not set forth every fact learned during the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged.

5. This affidavit is in support of a criminal complaint for Melvin Charles HILL and DeAndre Dayshawn NELSON for violations of 18 U.S.C. §§ 2113 (a) & (d).

PROBABLE CAUSE

6. I am investigating a string of armored truck robberies that have occurred since November 2023 in the San Antonio area. The first of five known, related robberies occurred on November 17, 2023 at USAA drive-thru ATMs located at 3023 Thousand Oaks Dr, San Antonio, TX 78247, and the most recent on the morning of March 20, 2024, at a Wells Fargo Drive-up ATM located in the parking lot of 1521 Austin Hwy San Antonio, TX 78218.

January 31, 2024 – Brink’s Truck Robbery at Chase Bank ATM at 13939 Nacogdoches Rd, San Antonio, TX

7. On January 31, 2024, at 16:14 hours, a red 2019 Mazda CX-5 with an unknown license plate (later determined to be stolen) was in the parking lot of the H-E-B at 14087 O’Connor Rd San Antonio, TX. Three minutes later, a Brink’s armored truck arrived in the adjacent parking lot of the Chase Bank at 13939 Nacogdoches Rd, San Antonio, TX. The CX-5 drove through adjacent parking lots of multiple businesses as the marked Brink’s truck parked in the bank’s ATM drive thru lanes. The CX-5 eventually parked in the parking lot of the McDonald’s located next to the Chase Bank ATM drive thru. At 16:54 hours, the Brink’s guard exited the truck carrying a tote of cash trays containing approximately \$166,000.

8. Two masked suspects, one with a firearm, exited the CX-5 and ordered the guard to the ground at gunpoint. The suspects ordered the guard to the ground and not to move after which one suspect stole the tote of cash trays containing approximately \$166,000 from the guard. The suspects continued to order the guard not to move as they retreated to the CX-5. The Mazda CX-5 departed within seconds of the suspects entering the car through the passenger side doors, indicating that the car was being operated by an additional suspect. The CX-5 fled the McDonald's parking lot, drove through the H-E-B parking lot, and turned north onto O'Connor Rd.

9. SAPD officers responded to the Chase Bank for a report of an armed robbery. SAPD interviewed witnesses and retrieved surveillance footage of the incident and determined the direction of travel for the getaway car. While SAPD was canvassing a nearby residential neighborhood, they found a stolen red Mazda CX-15 parked on the 5200 Block of Charolais (approximately .8 miles away from the scene of the robbery) bearing a fictitious paper temporary TX license plate. SAPD Crime Scene Personnel processed the exterior of the CX-5 for latent prints and collected a black beanie and McDonald's cup from outside the CX-5.

10. An SAPD Robbery detective later obtained a state search warrant for the CX-5. During the search, SAPD Crime Scene Personnel processed the interior of the CX-5 for forensic evidence, including latent prints and DNA swab.

11. An SAPD Latent Print examiner examined latent samples from the CX-5 and determined that a fingerprint from Melvin Charles HILL's right thumb was on the exterior of the front passenger door above the door handle of the CX-5. HILL's physical description—5'9" tall, about 190 lbs, in his mid-30's, with short hair—is consistent with the description of the suspects involved in the robbery. HILL has been convicted of multiple felonies, including robbery in 2009, and was wanted on multiple arrest warrants in Bexar County, including a felony weapons violation.

12. After the robbery, law enforcement surveilled HILL on multiple occasions. During surveillance, law enforcement observed HILL operate a 2018 GMC Sierra with chrome accents bearing TX license plates “STX5580”, which was registered to a relative, DeAndre NELSON. I observed the GMC Sierra parked in the driveway of a single-family residence on the 4000 block of Hershey Dr in San Antonio and observed HILL frequent a residence on the 4000 block of Hershey Dr during surveillance.

March 13, 2024 – Loomis Truck Robbery at Randolph Brooks Federal Credit Union ATM at 2514 N Loop 1604 W, San Antonio, TX

13. On March 13, 2024, at approximately 12:36 hours, a Loomis Truck guard parked in the ATM drive thru lanes of the Randolph Brooks Federal Credit Union located at 2514 N Loop 1604 W, San Antonio, TX exited his marked Loomis armored truck carrying several totes of cash trays.

14. Two masked suspects, one with a firearm, exited a gray Dodge Durango parked in an adjacent parking lot and ordered the guard to the ground at gunpoint. The suspects ordered the guard to the ground and not to move after which they stole the tote of cash with approximately \$132,000 from the guard. The suspects continued to order the guard not to move as they retreated to the Durango and fled the parking lot. The Durango departed within seconds of the suspects entering through the passenger side doors, making it likely that the Durango was being operated by an additional suspect.

15. SAPD officers responded to the RBFCU for a report of an armed robbery. While SAPD was canvassing a nearby residential neighborhood, they found a stolen gray Durango parked at the 16000 block of Huebner Rd (approximately 1.6 miles away from the scene of the robbery).

16. Meanwhile, I responded to the 4900 block of Hershey Dr. Around 14:30 hours, HILL arrived and parked a black 2023 Audi sedan bearing TX license plate “SSG1539” in the

driveway of a residence at the 4900 block of Hershey Dr. The Audi is owned by Enterprise Rent-A-Car and was rented by DeAndre NELSON on February 20, 2024. HILL washed the Audi with a garden hose, soapy water, and a rag, thoroughly wiping down the exterior doors and the body before offloading several white plastic grocery bags from the trunk of the car and taking them inside the residence.

March 20, 2024 – Brink’s Truck Robbery at Wells Fargo ATM at 1521 Austin Hwy, San Antonio, TX

17. On March 20, 2024, at approximately 08:50 hours, a marked Brink’s armored truck was parked in the parking lot of 1521 Austin Hwy San Antonio, TX 78218 to replenish a Wells Fargo standalone drive thru ATM. As the armed Brink’s driver was exiting the side door of their truck with ATM trays containing approximately \$120,000 in cash, a black GMC Sierra with chrome accents abruptly parked behind the guard, and two masked males exited the vehicle.

18. Suspect 1, a black male approx. 5’8”-5’11” tall and 195 lbs., exited the rear passenger side of the Sierra wearing a black hooded sweatshirt, black sweatpants, red ball cap with unknown white emblem on the center, grey athletic shoes, a light-colored surgical mask, and purple/blue nitrile gloves while wielding a black “AR” or “AK”-style firearm in his right hand. Suspect 1 sprinted toward the armored truck driver while ordering her to get on the ground. Meanwhile, Suspect 2 (3/20/24), a black male approx. 5’11”-6’1” tall and 200 lbs., exited the driver’s door of the Sierra dressed in a baby blue hooded sweatshirt with matching baby blue sweatpants, black athletic shoes, a dark face mask, and purple/blue nitrile gloves, and ran from the Sierra to the Brink’s employee. The Brink’s employee complied with the suspects’ demands and got on the ground, after which the suspects retrieved the multiple cash trays and ran back to the Sierra to flee the scene on Austin Hwy.

19. SAPD officers and detectives responded to the Wells Fargo Drive-up ATM. A witness to the robbery reported the license plate of the Sierra as TX “LPN3329.” Responding SAPD officers conducted record checks of the license plate “LPN3329” and learned that the tag was registered to an Audi sedan, not the pickup truck observed by the witness. SAPD used an automated license plate reader database and determined that several minutes after the robbery the police cruiser of a responding officer had scanned the TX license plate “LPN3329” as it was mounted to the front of a Black GMC Sierra with chrome accents.

20. I observed a photo of the GMC Sierra bearing TX license plate “LPN3329” and determined that it was similar to the one registered to NELSON. I also observed surveillance footage of the robbery and noted that HILL and NELSON appear to match the description provided for Suspect 1 (3/20/24) and Suspect 2 (3/20/24).

21. I responded to 4900 Block of Hershey Dr and observed HILL and NELSON walking back and forth between two residences. HILL and NELSON later departed the neighborhood in the black Audi sedan with TX license plate “SSG1539.” SAPD conducted a vehicle stop and arrested HILL on his unrelated state warrants while he was driving the Audi sedan on the 4600 block of Rigsby Ave with NELSON as the passenger. NELSON was wearing a tan Nike brand athletic track jacket with matching tan track pants and black shoes. NELSON was momentarily detained on the scene but released without charges while HILL was taken into custody and transported to SAPD Robbery’s Office for interview.

22. Meanwhile, investigators located the GMC Sierra used in the robbery parked in the driveway of a single-family residence at the 4200 block of Bikini Dr. Investigators contacted residents of the home and were informed that NELSON had come to the residence after the time of the robbery. SAPD seized the Sierra for a search warrant to be executed to examine its contents.

Investigators also obtained residential surveillance footage of NELSON entering the Bikini Dr residence wearing the same type of hooded baby blue sweat suit with black shoes as Suspect 2 had been wearing but without a mask. Investigators also retrieved blue/purple nitrile gloves from a trash container that was curbside at the residence.

23. A state search warrant was executed on NELSON's GMC Sierra and investigators found two loose \$20 bills under the driver's seat and a green/black Glock pistol in the front center console of the Sierra. I communicated with Brink's personnel and learned the money stolen the morning of March 20, 2024 was all in \$20 bills.

24. Investigators later received additional surveillance video footage from the Bikini Dr residence that showed that at about 09:57 hours the GMC Sierra was parked in the driveway as a sedan consistent with the black Audi with TX license plate "SSG1539" was parked at the curb in front of the residence. NELSON, dressed in the baby blue hooded sweatshirt with matching baby blue sweatpants with black athletic shoes, jogged from the driver side of the Sierra to the front door of the Bikini Dr residence and dropped a small, unknown object near the door. NELSON then jogged to the rear of his Sierra where HILL, who was wearing shoes, a sweatshirt, and sweatpants consistent with Suspect 1's outfit, was with a license plate in his hand as he opened the lid to a garbage can that was at the curb of the house. HILL appeared to discard a small object before returning to the rear of the Sierra. NELSON then walked from the Sierra while holding a duffle bag with volume, consistent with containing solid objects, in his left hand and walking to the open trunk of the black Audi sedan with HILL walking closely behind him. NELSON placed the bag in the trunk of the Audi sedan as he grabbed another object from the trunk along with HILL. Both HILL then NELSON then walked back to the Sierra each holding a license plate. NELSON walked to the front of the Sierra while HILL walked to the rear. When investigators

examined the Sierra, they noted that the license plate screws on the Sierra were around halfway inserted in the holder as opposed to being flush with the plate.

25. In a post-Miranda interview, HILL claimed not to have left Hershey Dr that day until the afternoon. HILL also strongly denied wearing another pair of clothes that day other than the green-blue-white Nike jumpsuit and green-white Nike sneakers that he was currently wearing. HILL initially strongly denied driving the Sierra for the last few months, and claimed not to have driven the Audi sedan for weeks before today until I confronted HILL that he had been observed operating both cars. HILL also strongly denied having ridden in the Mazda CX-5 used in the January 31, 2024 Brink's robbery.

26. On March 20, 2024, SAPD also arrested NELSON on the 4900 block of Hershey Dr and transported to SAPD Robbery's Office for interview. In a post-Miranda interview, NELSON initially denied owning his GMC Sierra and provided a schedule of his locations earlier that day that was not consistent with what investigators had observed through surveillance. NELSON eventually admitted that he had participated in the robbery (as Suspect 2) but emphasized that he was not armed during the robbery. NELSON admitted that the Glock pistol in the Sierra was his but claimed he had not touched it for months.

27. Wells Fargo is a bank organized and operating under the laws of the United States and is an institution the deposits of which are insured by the Federal Deposit Insurance Corporation.

10. Based on the above, your Affiant believes that there is probable cause to believe that on March 20, 2024, Melvin Charles HILL and DeAndre Dayshawn NELSON used force, violence, or intimidation to take from the presence of another money or property in the control, management, or possession of a bank, and in doing so assaulted another person or put in jeopardy

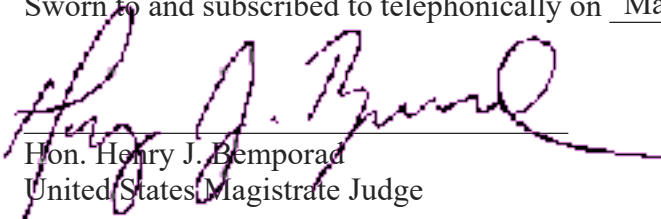
the life of that person by use of a dangerous weapon, in violation of 18 U.S.C. § 2113(a) & (d), and knowingly brandished a firearm during and in relation to that robbery.

GERALD-RASHID
ROBERTS

Digitally signed by GERALD-
RASHID ROBERTS
Date: 2024.03.22 11:28:25
-05'00'

Gerald-Rashid S. Roberts
Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to and subscribed to telephonically on March 22, 2024.



Hon. Henry J. Bemporad
United States Magistrate Judge